

cannot be joined. Second, this action involves questions of law and fact that are common to all class members. Third, because the challenged policies and practices apply with equal force to all class members, the claims of the named Plaintiff are typical of the class. Finally, the named Plaintiff will fairly and adequately represent the interests of the class. The named Plaintiff has a personal interest in the subject matter of the lawsuit, and Plaintiff's counsel is experienced in class action litigation and is prepared to pursue the case vigorously on behalf of the class. Because the putative class satisfies every element of Rule 23(a), and because the Defendant has acted and refuses to act on grounds generally applicable to the class as a whole, class certification is proper under Rule 23(b)(2).

For the reasons stated above and explained in the memorandum of law accompanying this filing, Plaintiff requests that this motion for class certification be granted.

Date: May 31, 2011

Respectfully submitted,

/s/ Corrie W. Cockrell

Miss. Bar No. 103276

Jody E. Owens, Miss. Bar No. 102333

Poonam Juneja, Miss. Bar No. 103181

Sheila A. Bedi, Miss. Bar No. 101652

Mississippi Youth Justice Project

A Project of the Southern Poverty Law Center

921 N. President St., Suite B

Jackson, Mississippi 39202

jody.owens@splcenter.org

poonam.juneja@splcenter.org

corrie.cockrell@splcenter.org

sheila.bedi@splcenter.org

601-948-8882 (telephone)

601-948-8885 (fax)

Wendy White, Miss Bar No. 100409

Disability Rights Mississippi

210 E. Capitol Street, Suite 100

Jackson, Mississippi 39201
wwhite@drms.ms
601-968-0600 (telephone)
601-968-0665 (fax)

Counsel for Plaintiffs.

CERTIFICATE OF SERVICE

I, Corrie Cockrell, one of the attorneys for the Plaintiff, do hereby certify that I electronically filed the foregoing Motion for Class Certification with the Clerk of the Court using the ECF system, which sent notification to all counsel of record.

SO CERTIFIED, this 1st day of June, 2011.

/s/ Corrie W. Cockrell

Corrie W. Cockrell, Miss. Bar No. 102376